



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 12, 2021

BY ECF

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
New York, New York 10007

Re: United States v. Paul M. Daugerdas, 09 Cr. 581 (DLC)

Dear Judge Cote:

The Government respectfully submits this letter to jointly propose a schedule in the above-referenced ancillary proceeding concerning Eleanor Daugerdas. After conferring with counsel for Petitioners, the Government understands that Petitioners' counsel will be away for two weeks beginning tomorrow, and as a result respectfully requests the Court permit the parties to conclude discovery on or before November 23, 2021. The parties further request an additional four weeks after the close of discovery – that is, until December 21, 2021 – to file any motions for summary judgment. To the extent a hearing is necessary, the parties would propose the Court schedule any hearing for February 2022.

*Granted. Opposition to a
motion is due 1/21/22.
Reply is due 2/1/22.*

*Denise Cote
10/13/21*

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

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cc: Counsel (by ECF)